

From: [Pavitt, John](#)
To: (b) (6)
Cc: [Skeens, Alyson](#)
Bcc: Emanuel.Ziolkowski@deg.idaho.gov
Subject: EPA asbestos requirements for the demolition of commercial building - Square Deal Store
Date: Thursday, December 09, 2021 2:48:00 PM
Attachments: [demolition-renovation-notification-form.pdf](#)
[Subpart M.pdf](#)

Hello Mr. Schkade. I am sending this email to follow up on our phone conversation this morning. Thank you for returning my call and providing information today.

I called to ask about the demolition of the former Square Deal Store in Caldwell, Idaho. EPA received information from the Idaho Department of Environmental Quality that the store was demolished and debris was hauled away and burned. A news account of the demolition was also carried in the local newspaper Owyhee Avalanche on October 13th. My understanding is the building was structurally unsound and then demolished in late September or early October. You said parts of the building were removed by contractors, such as the refrigeration system, propane heating system and the roof membrane. Some wastes like cyder blocks were hauled to the Nampa Landfill. You said the remaining lumber was hauled away to your farm and burned. Please correct me if my understanding is not right.

EPA regulates the demolition of commercial buildings under the asbestos National Emission Standards for Hazardous Air Pollutants (the "asbestos NESHAP"), which is a regulation under the Clean Air Act. The regulations are intended to prevent the release of asbestos fibers during demolition and renovation projects. Key requirements for building owners and operators are to conduct a survey for asbestos prior to starting a demolition project, and to send a notice to EPA at least 10 working days in advance so we have an opportunity to inspect the job site. As we discussed, EPA did not receive a notice from you for this job, and you said an asbestos survey was not performed.

When a building is structurally unsound and in danger of collapse, some asbestos NESHAP requirements are waived due to safety concerns, however notification is still required, and the resulting waste is generally assumed to contain asbestos unless shown otherwise.

Attached to this email is a copy of the asbestos NESHAP regulation and a blank notification form for your reference. A link to EPA's web site for asbestos is included below for your information.

Sincerely,

John Pavitt
US EPA R10, Alaska Operations Office
(907) 271-3688

To learn more about managing asbestos, protecting your family and hiring a professional, please see: www.epa.gov/asbestos.

For details about the asbestos regulation see: [EPA NESHAP Rule Link](#)

Please mail notifications for projects in **Alaska, Idaho and on Tribal lands** at least 10 working days in advance to:

Asbestos NESHAP Coordinator
US EPA, Region 10 (20-C04)
1200 Sixth Ave., Suite 155
Seattle, WA 98101